

**IN THE UNITED STATES COURT OF FEDERAL CLAIMS**

ACI-SCC JV, et. al.  
through their Trustee, Arwand Road and  
Construction Company,  
Plaintiffs,

v.

UNITED STATES OF AMERICA,  
Defendant

Case No. 1:17-cv-01749-TCW

Judge Thomas C. Wheeler

**PLAINTIFFS' TRUSTEE'S MOTION FOR PARTIAL SUMMARY  
JUDGMENT ON COUNT I, TRUSTEE'S DEMAND FOR SATISFACTION  
FOLLOWING ACCORD**

Plaintiffs, ACI-SCC JV, ACI-SCC JV LLC and Advanced Constructors International LLC ("ACI") through their Trustee, Arwand Road and Construction Company ("Arwand"), move for partial summary judgment on Count I of the Plaintiffs' complaint, Trustee's Demand For Satisfaction Following Accord. Plaintiffs' Trustee requests that this Court find that Plaintiffs lost their capacity to maintain a suit or receive satisfaction of any accord.

Plaintiffs' Trustee's motion is supported by Plaintiffs' Supporting Factual

Positions, Memorandum of Points and Authorities, 25 attached documents and exhibits, declarations of Shoaib Latifi, Wahid Ahmadi, Walt Pennington and Request for Judicial Notice.

Respectfully submitted,

November 30, 2017

/s Walt Pennington

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### **CERTIFICATE OF SERVICE**

I hereby certify that I electronically filed the foregoing and all accompanying documents and exhibits with the Clerk of the Court for the United States Court of Federal Claims by using the CM/ECF system on November 17, 2017.

I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

/s Walt Pennington

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